

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LAWRENCE MALLY, on behalf of
himself and all others similarly situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., RUI LIN WU, AND ALBERT LEUNG,

Defendants.

CIVIL ACTION NO. 07 CV 7097

MILTON PFEIFFER, ON BEHALF OF
HIMSELF AND ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., RUI LIN WU, AND ALBERT LEUNG,

Defendants.

CIVIL ACTION NO. 07 CV 7252

(Captions continued . . .)

NOTICE OF MOTION

ISAAC FISHMAN, CUSTODIAN FOR THE
IBF FOUNDATION, ON BEHALF OF
ITSELF and ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., WU RUI LIN, WU ZHI-YANG,
ALBERT LEUNG, SONNY KWOK WING
HUNG, ZE YUN MU, YI HONG ZHANG
and GROBSTEIN, HORWATH &
COMPANY LLP,

Defendants.

CIVIL ACTION NO. 07 CV 7312

MICHAEL LOCKE, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., RUI LIN WU, ALBERT LEUNG, ZHI
YANG WU, SONNY KWOK WING HUNG,
ZE YUN MU, YI HONG ZHANG and
GROBSTEIN, HORWATH & COMPANY
LLP,

Defendants.

CIVIL ACTION NO. 07 CV 7693

REUVEN LAPIN, individually and on behalf
of all others similarly situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE,
INC., RUI LIN WU, and ALBERT LEUNG,

Defendants.

CIVIL ACTION NO. 07 CV 7829
“ECF CASE”

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Declaration of Gustavo Bruckner, Memorandum of Law, and Proposed Order, Mr. Joseph Mustachia will move this Court located at the Courthouse, 500 Pearl Street, New York, New York 10007, on October 9, 2007, or as soon thereafter as counsel may be heard for an Order pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”) and 27(a)(3)(B) of the Securities Act of 1933, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), for his appointment to serve as Lead Plaintiff on behalf of all persons who purchased Qiao Xing Universal Telephone, Inc. common stock between June 30, 2004, and July 16, 2007, inclusive, seeking to pursue remedies under the Exchange Act and Rule 10b-5, promulgated thereunder (the “Class”); and for the approval of his choice of Wolf Haldenstein Adler Freeman & Herz LLP as Lead Counsel.

PLEASE TAKE FURTHER NOTICE, that Mr. Mustachia, as the proposed Lead Plaintiff for the Class, has timely filed his motion and, pursuant to the PSLRA, is believed to constitute the investor with the largest financial interest in the outcome of the case for the Class, and is otherwise the most adequate Lead Plaintiff. Mr. Mustachia satisfies the requirements of the PSLRA and Rule 23 of the Federal Rules of Civil Procedure in that his claims are typical of the claims of the Class, and he will fairly and adequately represent the interests of the Class. Mr. Mustachia’s choice of counsel should be accepted by this Court because his selected counsel is a nationally

recognized firm with extensive experience and expertise in securities fraud and other class actions.

Dated: October 9, 2007
New York, New York

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: _____/s/
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Proposed Lead Counsel

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